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18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK, N.A., AS TRUSTEE,
28 SUCCESSOR IN INTEREST TO
29 WACHOVIA BANK NATIONAL
30 ASSOCIATION, AS TRUSTEE FOR GSAA
31 HOME EQUITY TRUST 2005-11, ASSET-
32 BACKED CERTIFICATES, SERIES 2005-
33 11,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,
37 INC., et al.,

38 Defendants.

Case No.: 2:21-cv-00339-GMN-VCF

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 7] AND MOTION FOR FEES AND
COSTS [ECF No. 8]**

(First Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
3 stipulate and agree as follows:

- 4 1. On February 26, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-830198-C [ECF No. 1-1];
- 6 2. On February 26, 2021, Chicago Title filed a Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On March 30, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion
9 for Costs and Fees [ECF No. 8];
- 10 4. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
11 for Costs and Fees is April 13, 2021;
- 12 5. Chicago Title’s counsel is requesting an extension until May 5, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Chicago Title requests a brief extension of time to respond to the Motion for Remand
15 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
16 the legal arguments set forth in U.S. Bank’s motions;
- 17 7. U.S. Bank does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through
3 and including May 5, 2021.

4
5 Dated: April 9, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY
9

10 Dated: April 9, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
12 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY
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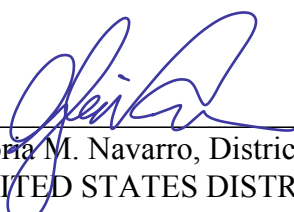
14 Dated: April 9, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
LINDSAY D. ROBBINS
16 Attorneys for Plaintiff U.S. BANK
NATIONAL ASSOCIATION
17
18

19 **IT IS SO ORDERED.**

20 Dated this 9 day of April, 2021

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24 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

